

EXHIBIT 1

REDACTED

EXHIBIT 2

REDACTED

EXHIBIT 3

REDACTED

EXHIBIT 4

Andres Healy

From: Lee, Jinyung <jinyung.lee@sidley.com>
Sent: Friday, May 3, 2019 1:59 PM
To: Andres Healy; Nagdev, Ash; Hanhan, Melinda; Kang, Peter H.; Smith, Rodger (EXTERNAL @MNAT.COM); Sandrock, Ryan; Ou, Philip; Yen, Bruce; Shaw, John (EXTERNAL @SHAWKELLER.COM); Radhesh Devendran; Trevino, Daniel; Mary Oros; Chaikovsky, Yar R.
Cc: Hunter Vance; Jeff David; Jenna Farleigh; Joanna Stanley; Lexie White; Farnan, Brian (EXTERNAL @FARNANLAW.COM); Farnan, Michael
Subject: RE: LGE / 3G (17-085) -- Deposition Notices for Marcello Dini, Roy Chen and Pierpaolo Carruba -- D.I. 262-264

Andres,

We will discuss with HTC's counsel regarding dates for Mr. Carruba and Mr. Dini. (copied here)

As for Mr. Chen, we will get back to you.

Thank you,
Jinyung

JINYUNG LEE

Associate

SIDLEY AUSTIN LLP
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From: Andres Healy <AHealy@susmangodfrey.com>
Sent: Friday, May 3, 2019 11:50 AM
To: Nagdev, Ash <anagdev@sidley.com>; Lee, Jinyung <jinyung.lee@sidley.com>; Hanhan, Melinda <mhanhan@sidley.com>; Kang, Peter H. <pkang@sidley.com>; Smith, Rodger (EXTERNAL @MNAT.COM) <rsmith@mnat.com>; Sandrock, Ryan <rsandrock@sidley.com>
Cc: Hunter Vance <HVance@susmangodfrey.com>; Jeff David <JDavid@susmangodfrey.com>; Jenna Farleigh <JFarleigh@susmangodfrey.com>; Joanna Stanley <jstanley@SusmanGodfrey.com>; Lexie White <lwhite@susmangodfrey.com>; Farnan, Brian (EXTERNAL @FARNANLAW.COM) <bfarnan@farnanlaw.com>; Farnan, Michael <mfarnan@farnanlaw.com>; Andres Healy <AHealy@susmangodfrey.com>
Subject: RE: LGE / 3G (17-085) -- Deposition Notices for Marcello Dini, Roy Chen and Pierpaolo Carruba -- D.I. 262-264

Counsel,

As previously discussed (and communicated to you again this morning), Mr. Carrubba and Mr. Dini are available on May 23 and May 24, respectively. They are not available on May 13 or May 15.

Further, as also communicated, Mr. Chen is not an employee of any Plaintiff, and we have no ability to make him available in response to your notice. In addition, while we remain happy to

reach out to Mr. Chen to see if he will agree to be deposed voluntarily, we understand from Mr. Ou that Defendants are not willing to depose Mr. Chen where he resides (Hong Kong) or pay for him to come to the United States. If that has changed, please let us know.

Best,

Andres C. Healy | Susman Godfrey LLP
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[Susman Godfrey's 2018 Year in Review](#)

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From: Hoy, Rebecca <rhoy@MNAT.com>
Sent: Friday, May 3, 2019 11:09 AM
To: 80928 MNAT Internal <80928.wilm@wcs.mnat.com>; Andres Healy <AHealy@susmangodfrey.com>; 'Farnan, Brian' <bfarnan@farnanlaw.com>; Farnan, Michael <mfarnan@farnanlaw.com>; Hunter Vance <HVance@susmangodfrey.com>; Jeff David <JDavid@susmangodfrey.com>; Jenna Farleigh <JFarleigh@susmangodfrey.com>; Joanna Stanley <jstanley@SusmanGodfrey.com>; Joseph Farnan <farnan@farnanlaw.com>; Lexie White <lwhite@susmangodfrey.com>; Rocco Magni <RMagni@susmangodfrey.com>; Smith, Rodger <RSmith@MNAT.com>
Subject: LGE / 3G (17-085) -- Deposition Notices for Marcello Dini, Roy Chen and Pierpaolo Carruba -- D.I. 262-264

On behalf of Rodger D. Smith II, I forward the following:

Document Number: [262](#)

Docket Text:

NOTICE to Take Deposition of Marcello Dini on May 13, 2019 filed by LG Electronics Inc., LG Electronics U.S.A., Inc..(Smith, Rodger)

Document Number: [263](#)

Docket Text:

NOTICE to Take Deposition of Roy Chen on May 14, 2019 filed by LG Electronics Inc., LG Electronics U.S.A., Inc..(Smith, Rodger)

Document Number: [264](#)

Docket Text:

NOTICE to Take Deposition of Pierpaolo Carruba on May 15, 2019 filed by LG Electronics Inc., LG Electronics U.S.A., Inc..(Smith, Rodger)

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